

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CARLOS CONTRERAS,

2:25-cv-00418-NJC-AYS

Plaintiff,

-against-

POLAR PROPERTY SERVICES, INC.,
JOHN A. ROMANELLI, and RICHARD
P. SCULCO,

**DECLARATION OF KEITH E.
WILLIAMS, ESQ. IN SUPPORT OF
DEFENDANTS' MOTION TO
PARTIALLY DISMISS PLAINTIFF'S
AMENDED COMPLAINT PURSUANT
TO FED. R. CIV. P. 12(b)(6)**

Defendants.

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I, KEITH E. WILLIAMS, ESQ., hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am over the age of 21, competent to testify, and if called to testify would do so consistently with all matters set forth herein.
2. I am an attorney at The NHG Law Group, P.C., counsel of record for Defendants, POLAR PROPERTY SERVICES, INC., JOHN A. ROMANELLI, and RICHARD P. SCULCO (collectively, "Defendants") in this action. As such, I have personal knowledge of the facts set forth in this Declaration.
3. I submit this Declaration in Support of Defendants' Motion to Partially Dismiss the Amended Complaint of Plaintiff, CARLOS CONTRERAS ("Plaintiff").
4. Attached hereto at **Exhibit A** is a true and accurate copy of Plaintiff's Complaint, dated January 13, 2025 and filed on January 24, 2025 [D.E. 1].

Continued on next page.

5. Attached hereto at **Exhibit B** is a true and accurate copy of Plaintiff's Amended Complaint, dated and filed on May 16, 2025 [D.E. 18].

Dated: Massapequa, New York
September 22, 2025



Keith E. Williams, Esq.
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